

5. One of the things Tommy did to joke around as one of the guys was to pretend to hit or actually flick some of his friends in the groin area. He did this to me on one occasion. I do not think he meant to hurt me or was acting maliciously in any way. Tommy was just playing around. I did not like it and did not want to play around in that way so I hit him back and told him never to do that again. He never did. Some of the other guys would hit him back as well. From what I observed, Tommy only cut up and played around with employees he had worked with for a long time.

6. I saw Tommy flick Michael in the groin two or three times. Each time, Michael appeared to be laughing and joking along with Tommy. He did not appear hurt or upset in any way. Michael never complained to me about this and I did not hear him complain to anyone else in management about it. It really appeared to me that they were two friends cutting up. If Michael had complained to me or asked me to help him in any way, I would have. I would have addressed it with Tommy and told him to stop. If he did not stop, I would have advised Michael to make a report to the corporate office or made the report myself.

7. WestRock has a Compliance Hotline employees can use to make reports. Reports can be made anonymously and they are investigated by corporate Human Resources. The Compliance Hotline number is in the Employee Handbook and is also posted on the employee bulletin board. It has been posted there for years.

8. I understand that Michael is now suing WestRock claiming that Tommy sexually harassed him by hitting him in the groin. I'm surprised that he is doing so. Again, Michael never seemed offended by Tommy in any way. He laughed and joked back with Tommy. He certainly never mentioned that he felt Tommy was sexually harassing him. If he had, I would have reported

it. I myself never witnessed anything between Tommy and Michael that I thought was sexual harassment. Again, it appeared to me that they were friends cutting up with each other.

9. Tommy could be intimidating at times. He was quick to say he would terminate people during meetings. From what I observed, these were empty threats and he never followed through. He would also cuss on the floor and during general meetings when he was in a bad mood. He did these things in front of both male and female employees.

10. Michael also cussed on the floor. I've heard him use the words/terms "mother fucker," "son of a bitch," "fuck," and others.

11. Tommy is no longer employed by WestRock. He was terminated in late August 2016. I was informed that he was terminated for violating the Code of Conduct following an investigation by Human Resources conducted in August 2016. I can understand why Tommy was terminated. The General Manager hitting an employee in the groin would be a violation of the Code of Conduct. That is something corporate management would not expect a General Manager to do in the workplace.

12. It is my understanding that an anonymous complaint was made in August 2016. Our Human Resources representative, Terri Henley, interviewed me and several other employees during the investigation.

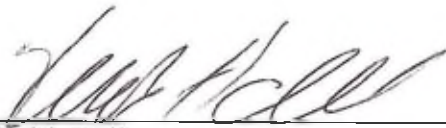
13. Following Tommy's termination, Michael filing a lawsuit, and my promotion to Plant Manager, I've started thinking differently about Tommy's actions. If I were to witness similar conduct today, I would report it even if it appeared to be conduct between two friends cutting up. My view now is that it is better to report it and have Human Resources look into it. Looking back, even though Tommy and Michael appeared to be two friends joking around, Tommy's conduct was inappropriate and violated the company's Code of Conduct, which

prohibits horseplay. WestRock does not expect General Managers to engage in that type of conduct.

14. No one has promised me anything or coerced me in any way to make this declaration. No one has put any pressure on me to say or not say anything whatsoever.

15. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed this 19 day of January, 2018



Keith Hall